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15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**  
18

19 IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
20 LITIGATION

21 \_\_\_\_\_  
22 This Document Relates to:  
23 ALL ACTIONS  
24

Case No. 3:23-MD-3084-CRB

**DECLARATION OF RANDALL S. LUSKEY  
IN SUPPORT OF ADMINISTRATIVE  
MOTION TO SEAL MATERIALS  
PRODUCED ON JANUARY 16, 2024  
PURSUANT TO JANUARY 9, 2024 ORDER**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

*(Filed Concurrently with Administrative Motion  
to Seal Materials, Stipulation, Notice of Lodging  
of Materials, [Proposed] Order)*

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**DECLARATION OF RANDALL S. LUSKEY**

I, Randall S. Luskey, declare as follows:

1. I am a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, representing Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (“Uber”). I am a member in good standing of the Bar of the State of California. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. I respectfully make this declaration in support of Uber’s Administrative Motion to seal Exhibit A to Uber’s Notice of Lodging of Materials Produced on January 16, 2024 pursuant to the Court’s January 9, 2024 Order (“Exhibit A”), pursuant to Civil Local Rules 7-11 and 79-5. I have reviewed Exhibit A filed in connection with the Administrative Motion to Seal.

3. Exhibit A includes a list of the full legal names, business titles and employment dates for over 15,000 current and former Uber employees. Exhibit A also includes detailed information about Uber’s custodial and non-custodial ESI Sources, such as the specific software systems Uber employs (both at present and historically) for various operational purposes, information related to the manner and methods with which Uber employees communicate with one another and conduct the company’s business, and internal corporate policies regarding information retention protocols.

4. The information contained in Exhibit A includes private, commercially sensitive, and proprietary business information about Uber’s employees and operations. Exhibit A could reveal Uber’s organizational structure, allocation of resources to different facets of the company, and its operational tools and methods. Exhibit A would also expose the personal, private information of over 15,000 individuals. In other words, Exhibit A contains competitively sensitive and proprietary information, the disclosure of which could cause harm to Uber.

5. The Exhibit A materials to be sealed contain only the sensitive information which Uber’s Motion is intended to protect from public dissemination.

